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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**FURTHER SUBMISSION IN
RESPONSE TO QUESTION 2 IN
ORDER FOR FURTHER RESPONSES
RE DIXIE FIRE**

Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this further response to Question 2 in the Court’s September 14, 2021 Order for Further Responses re Dixie Fire (Dkt. 1470), as clarified in the Court’s October 28, 2021 Fourth Further Request re Dixie Fire (Dkt. 1499).

Question 2:

As a single exhibit, provide all PG&E (and partner, contractor, etc.) internal emails, texts, memos, and other documents created on July 13 or 14, 2021, pertaining to the July 13 incident on the Bucks Creek 1101 line, and separately summarize them.

The Court’s October 28, 2021 order included the following clarifying language with respect to Question 2:

By way of clarification, please submit a summary of the files submitted in response to Question 2 with each submission, not at the conclusion of all submissions (see Dkt. No. 1491 at 3).

PG&E Further Response:

Consistent with PG&E’s September 24, 2021 submission (Dkt. 1479) and its November 4, 2021 submission (Dkt. 1505), PG&E is delivering to the Court on November 18, 2021 a thumb drive containing electronic copies of 252 documents bearing Bates PGE-DIXIE-NDCAL-000022755 to PGE-DIXIE-NDCAL-000023220 that PG&E has identified as responsive to this request.¹ These documents include emails, messages, and other documents from July 13-14, 2021 that have been collected from Custodians, as well as non-custodial documents, as described in PG&E’s September 24, 2021 submission. (See Dkt. 1479 at 4-5.) As with the thumb drives PG&E submitted on September 28, October 12, and November 4, 2021, PG&E is not able to provide the documents as a single exhibit because the documents are different file types, some of which are

¹ As set forth in PG&E’s September 24, 2021 submission, PG&E does not interpret the Court’s question as calling for information protected by the attorney-client privilege or attorney work product protection. Where applicable, PG&E is redacting portions of documents determined to be protected by attorney-client privilege or to constitute attorney work product.

1 produced as PDF images (e.g., .msg, .rsmf, and .png files) and some of which are produced in native
2 format (e.g., .xlsx files). To facilitate the Court's review, the thumb drive includes (1) a combined
3 PDF of the entire production, with slipsheets for documents being produced in native format, and (2)
4 an index identifying the Bates range and custodian(s) for each document family in the production.

5 As set forth in PG&E's September 24, 2021 submission, certain documents being
6 provided to the Court contain personally identifying information and other confidential information.
7 PG&E is in the process of identifying this confidential information and will prepare and deliver a
8 redacted set.

9 Pursuant to the clarification in the Court's October 28, 2021 order, PG&E is also
10 submitting on a separate thumb drive an excel chart containing a summary of documents submitted
11 as of November 18, 2021 in response to this request. PG&E previously provided, in its November 4,
12 2021 submission (Dkt. 1505), a description of the columns in the chart and a brief description of the
13 document categories referenced therein.

14 With the additional documents being delivered to the Court on November 18, 2021,
15 PG&E has produced 2,972 documents in response to this request. The efforts that PG&E undertook
16 to locate and produce documents responsive to this request are set forth in PG&E's September 24,
17 2021 submission (Dkt. 1479); PG&E ultimately collected and reviewed documents from a total of 80
18 Custodians and 32 Mobile Custodians. PG&E has now produced all documents that it has collected
19 and identified as responsive to this request.

1 Dated: November 18, 2021

Respectfully Submitted,

2 JENNER & BLOCK LLP

3
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